



Laramie Rivers Conservation District

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Tony Hoch, Director

Melissa Martin
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Subject: Comment on Medicine Bow Landscape Vegetation Analysis Project

Ms. Martin,

As a cooperating agency it is a given that the Laramie Rivers Conservation District supports this project.

General Comments:

We believe that being more proactive on fire suppression while stimulating the local economy, and working closely with Wyoming Game and Fish Department on their objectives for wildlife habitat is a logical and desirable plan of action by the Forest Service. We are also realistic in our belief that the only way any of this work will get done is if it is done by private contractors who can harvest marketable timber, so the clock is ticking.

All of the discussed work is tied to the Final EIS and Revised Land and Resource Management Plan of December, 2003, so there is nothing new here about land management prescriptions for given geographic areas. We hear the public concerns that much land is marked as Treatment Opportunity Areas, but we share the view of the Forest Service that this is over two mountain ranges and over 10-15 years and subject to contractor availability and product viability. We understand that LaVA is a landscape-scale Global Information System (GIS) exercise to implement the existing Forest Plan. With GIS, it is possible to look at a project of this scope and overlay data layers showing management needs/strategies related to severity of beetle kill and to rule out sensitive wildlife, watershed, and cultural features based on the same data and technology. This is much more efficient and inexpensive than going through the NEPA process project by project.

We acknowledge that individual timber sale details need to be ground-truthed, and that temporary road locations will be determined after considering sensitive issues such as fisheries, hydrology/erosion, rare plants and sensitive ecosystems, soils, old growth forests and scenic resources.

We have held a stewardship contract in the Medicine Bow National Forest in the last decade and believe that timber projects today are much more sensitive to the landscape than the gridded "cookie cutter projects" of the previous century. We have seen firsthand that temporary roads are indeed temporary and will fade relatively quickly away if properly reclaimed.

We understand that to some extent the condition of the Medicine Bow National Forest today is a product of poor management and then no management over the past century and that simply walking away from managing it is not going to improve the fire situation. Massive wildfires are of great concern to us because of the potential loss of valuable private property, expenditure of public resources on fire suppression, and the health of nearby residents who can suffer decreased air quality for weeks or months at a time.

Pre-implementation and implementation checklists, and strict standards & guidelines (again, we have held a forest contract) will help ensure that best management practices and national standards for watershed are met, as we have discussed in cooperators meetings.

Other Comments:

Chapter 2: if one of the main themes of this project is to avoid negative effects of large uncontrolled wildfires, then negative effects of large, uncontrolled wildfires should be discussed consistently for each resource category under "effects of no action". The effects of "no action" discussion is pretty thin throughout the analysis, when one of the goals of the project is to avoid the effects of no action.

Chapter 3: again, potential wildfires are not discussed consistently in the "no action" discussions, and sometimes the document states that there are no cumulative effects of "no action" but we are not certain that that is always the case.

Following up on both of the above comments, we hope that a final edit on the document will bring consistency among the sections that have been written by different specialists.

And finally, we do support and have been cooperating on the formulation of this document, but we still think the USFS needs to spell out better how public comments will be addressed as individual projects are proposed. This would dispel a lot of the uncertainty about the project that we are hearing from the public.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tony Hoch", with a stylized, flowing script.

Tony Hoch

On behalf of the Laramie Rivers Conservation District.